

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MARISA WOODHOUSE, on behalf of	)	
herself and others similarly situated,	)	
	)	
Plaintiffs,	)	
v.	)	No. 09-C 5593
	)	
LINEBARGER GOGGAN BLAIR &	)	Judge Pallmeyer
SAMPSON, LLP,	)	
	)	
Defendant.	)	
	)	

**AGREED MOTION FOR TWO DAY EXTENSION TO RESPOND TO DISCOVERY**

NOW COMES the Defendant, LINEBARGER GOGGAN BLAIR & SAMPSON, LLP, by and through its undersigned attorneys, and pursuant to FRCP 6(e), moves this Honorable Court to issue an order extending the time for Defendant to respond to discovery by two days, from April 13, until April 15, 2010, and in support states the following:

1. This is an agreed motion.
2. Plaintiff Marisa Woodhouse has now filed a Third Amended Complaint to redress purported negligent and wilful violations violation of the Telephone Consumer Protection Act, 47 U.S.C. § 227 ("TCPA").
3. Defendant has answer the Third Amended Complaint along with answering Plaintiff's Request For Admissions.
4. Plaintiff's Motion for Class Certification is pending, and Plaintiff is required to respond by April 30, 2010.
5. Due to work committments and the recent delivery of draft discovery answers and potentially responsive documents, defense counsel was unable to comply with producing discovery responses by the April 13, 2010 court-ordered deadline. Plaintiff's counsel has agreed to a two day extension to allow defense counsel to respond to pending discovery requests.

3. The parties have scheduled a discovery conference on April 16, 2010 to discuss anticipated discovery objections. Additionally, the parties are trying to schedule a FRCP 30(b)(6) deposition of Defendant along with depositions of Plaintiff and her minor daughter.

4. Accordingly, no harm or prejudice will result from granting this motion.

WHEREFORE, for the reasons set forth above, Defendant, LINEBARGER GOGGAN BLAIR & SAMPSON, LLP, requests this Honorable Court issue an order extending the time for Defendant to respond to discovery by two days, until April 13.

Respectfully submitted,

/s/ James C. Vlahakis  
James C. Vlahakis  
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**CERTIFICATE OF SERVICE**

I hereby certify that on April 13, 2010, I electronically filed the above document with the Clerk of the Court using the CM/ECF system which will send notification of such filing(s) to all counsel of record.

Respectfully submitted,

/s/ James C. Vlahakis  
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